

Exhibit H

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Linda Tirado,

Plaintiff,

Case No. 0:20-cv-01338-JRT-
ECW

v.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo, *in his
official capacity*; Robert Kroll, *in his
individual capacity*; and Minneapolis
Police Department Officers John Does
1-4, *in their official and individual
capacities*,

Defendants.

**PLAINTIFF LINDA TIRADO'S SECOND SET OF REQUESTS FOR DOCUMENT
PRODUCTION TO DEFENDANTS CITY OF MINNEAPOLIS AND CHIEF OF
POLICE MEDARIA ARRADONDO**

Pursuant to the Federal Rules of Civil Procedure and any and all applicable local civil rules of the United States District Court for the District of Minnesota, plaintiff Linda Tirado ("Tirado") requests that defendants City of Minneapolis and Minneapolis Chief of Police Medaria Arradondo (collectively, "the City") produce and permit the inspection and copying of the Documents described below in accordance with the definitions and instructions set forth below at the offices of

Sidley Austin LLP, 787 Seventh Avenue, New York, New York, 10019, or at such other place as may be agreed upon, within thirty days from the date of service hereof.

DEFINITIONS

1. “Any” or “each” should be understood to include and encompass “all”; “or” should be understood to include and encompass “and”; and “and” should be understood to include and encompass “or.” “And” and “or” shall be construed both conjunctively and disjunctively.

2. The “Area Near Minneapolis’s Fifth Precinct” refers to the area near the Minneapolis Police Department Fifth Precinct building located at 3101 Nicollet Avenue, Minneapolis, MN, 55408, and specifically includes the area within the following geographical boundaries: North of 35th Street, East of Lyndale Avenue, South of Lake Street, and West of Interstate 35W.

3. “Complaint” means the Amended Complaint filed in this action by Plaintiff Linda Tirado on July 29, 2020, or any later Amended Complaint filed in this action.

4. “Crowd Control Weapons” shall have the meaning set forth in the documents produced by the City, i.e., “include[s] but is not limited to, chemical agents, rubber bullets, flash-bangs, batons, riot sticks, and marking rounds,” and “aerosols, chemical munitions or projectiles (CS, OC, SN), smoke munitions or projectiles, marking rounds (40mm direct, exact or blunt impact projectiles or

rounds), rubber bullets, ASP batons, riot sticks, and light sound distraction devices (inert, CS, OC or CN blast balls).”¹

5. “Defendants” includes the City of Minneapolis, Minneapolis Chief of Police Medaria Arradondo, Minneapolis Police Lieutenant Robert Kroll, and John Does 1-4, as well as any as well as any assigns, agents, representatives, attorneys, employees, officers, directors, affiliates, subsidiaries, persons, or entities acting or purporting to act on their behalf.

6. “Grossman” refers to Lieutenant Colonel Dave Grossman, the author and trainer who founded the Killology Research Group and conducts trainings on “Sheepdog mentality.”

7. “Including” means including without limitation.

8. “Killology,” refers to the publication and website of Killology LLC and/or Killology Research Group, which provides studies and trainings on the reactions of healthy people in killing circumstances (such as police and military in combat).

9. “Kroll” means Defendant Robert Kroll.

10. “Less-lethal projectiles” or “non-lethal projectiles” includes any and all projectiles, ammunition, guns, weapons or dispensers deployed by the Minneapolis Police Department designed to be less lethal than conventional metal bullets.

¹ See, e.g., MPLS_Tirado002161; MPLS_Tirado002219.

11. “May 29 Protests” means the George Floyd Protests occurring on May 29, 2020 and after midnight on May 30, 2020 in Minneapolis, Minnesota.

12. “Minneapolis Police Department” refers to the primary law enforcement agency in Minneapolis, Minnesota, as well as any assigns, agents, representatives, attorneys, employees, officers, directors, affiliates, subsidiaries, divisions, precincts, persons, or entities acting or purporting to act on the behalf of the Minneapolis Police Department.

13. “Relating to” and “Concerning” each mean, in addition to their usual and customary meanings, concerning, relating to, discussing, mentioning, evidencing, embodying, constituting, effecting, referring to, assessing, recording, analyzing, describing, evaluating, memorializing, about, regarding, touching upon, listing, or reflecting the matter specified in the request.

14. “Relevant Time Period” means August 18, 2008 through the present.

15. “Sheepdog training” refers to the trainings and methods of Lieutenant Colonel Dave Grossman and the Killology Research Group.

16. “Warrior-Style Training” means and refers to training within the definition of that phrase in Minn. Stat. § 626.8434 subd. 1, regardless of whether such training occurred before or after the effective date of that definition.

17. “You” or “Your” means and refers to the City of Minneapolis, Arradondo and the Minneapolis Police Department, as well as any successors, predecessors,

assigns, agents, representatives, attorneys, employees, officers, directors, affiliates, subsidiaries, persons, or entities acting or purporting to act on any behalf of the City of Minneapolis, Arradondo or the Minneapolis Police Department.

INSTRUCTIONS

1. Each Document is to be produced (along with all drafts thereof) in its entirety, without abbreviation or expurgation.
2. Separate and complete responses are required for each request.
3. Produce all requested Documents and Communications in Your possession, custody, or control, including those of Your predecessors, successors, assigns, principals, agents, attorneys, accountants, affiliates, directors, officers, consultants, employees, independent contractors, bailees, representatives or other entities under Your common control, and any companies for which You have access to documents or information related to these requests for production, and any other person or entity from whom You can obtain such Documents and Communications by request or which You have a right to bring within Your possession by demand.
4. Unless otherwise stated, the date range for these Requests shall be the Relevant Time Period.
5. These Requests are continuing in nature through the conclusion of this Action and require supplemental or additional responses when you obtain or become aware of any new, further, or additional Documents or Communications responsive to these Requests pursuant to Federal Rule of Civil Procedure 26(e).

Responsive documents obtained or discovered after any response to these Requests must be promptly produced.

6. If you withhold any Document or Communication requested herein on the basis of any assertion of privilege or other immunity from discovery, you must comply with the requirements of the Federal Rules of Civil Procedure.

DOCUMENT PRODUCTION FORMAT

1. Please produce all documents according to the Stipulation for ESI Protocol entered on April 30, 2021 (Dkt. 77).

DOCUMENT REQUESTS

1. All Documents and Communications between the City and any Defendant or Minneapolis Police Department officers, employees, and officials relating to Law Officer's online training materials, commonly referred to as Warrior-Style Training, or relating to Killology, Sheepdog training, and/or any other trainings by Lieutenant Colonel Dave Grossman, which were made available to the Minneapolis Police Department's officers, employees, and officials.

2. The Minneapolis Police Department personnel file for Kroll.

3. All Documents and Communications relating to any training programs, courses, or education of any Minneapolis Police Department officers, employees or officials which Kroll attended and/or participated in and which relate to the issues described in the Complaint, including but not limited to: a) the Use of Force; b) the use of less-lethal or non-lethal projectiles; c) the use of Crowd Control

Weapons; d) the use of foam rounds or bullets, weapons, firearms, devices, SWAT gear, combat gear, chemical irritants; or e) any tactics or methods used for crowd control (including but not limited to protests, riots, or other public demonstrations or gatherings).

4. Any and all Documents and Communications relating to any disciplinary proceedings against Kroll, including but not limited to all documents and communications contained within Kroll's Minneapolis Police Department personnel file relating to any disciplinary action or investigations into Kroll's conduct, regardless of the result of any such action or investigation.

5. All Documents and Communications relating to any civil complaints filed against Kroll with the Internal Affairs Unit of the Minneapolis Police Department.

6. All Documents and Communications related to Minneapolis Civilian Review Authority and Office of Police Conduct Review records in connection with complaints filed against Kroll.

7. All training records relating to the use of 40 mm less lethal projectile launchers for all Minneapolis Police Department officers who received such trainings and who were on duty in the Area Near Minneapolis's Fifth Precinct during the May 29 Protests.

Dated: August 19, 2021

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